

01 March 1984

U.S. Environmental Protection Agency
Region VII
324 East Eleventh Street
Kansas City, Missouri 64106

Attention: Mr. David A. Wagoner, Director
Air and Waste Management Division

Reference: EPA Letter to J. C. Patterson dated 27 January 1984

Enclosure: (1) Part "B" Page G-4, Revision No. 1 (6 copies)
(2) Hazardous Waste Storage Areas - Inspection Instructions
(3) Part "B" Page D-4 - Marked-up Copy (6 copies)
(4) Part "B" Page D-8 - Marked-up Copy
(5) Engineering Certification (6 COPIES)
(6) "List of Attachments" Revision No. 1 (6 copies)
(7) Part "B" New Pages F-19, F-20, F-21, F-22 (6 copies)
(8) Part "B" Page I-3, Revision No. 2 (6 copies)
(9) Part "B" Pages I-7, I-8, I-9, Revision No. 2 (6 copies)

REGISTERED MAIL - RETURN RECEIPT



R00144291

RCRA RECORDS CENTER

Dear Mr. Wagoner:

We do wish to review and discuss your draft of the RCRA permit for our facility. We have contacted Mr. Stephen Busch of your staff and he has agreed to notify MDC of an appropriate time for the review.

In order to avoid cross-referencing, we are using a format of quoting each of your specific paragraphs and then following each one with our response. We trust that this will assist your evaluation of our permit application.

EPA Statement

"1. Are all containers properly identified when placed in RCRA storage areas? In the waste analysis plan, a good deal of emphasis is placed on waste identification from the source of the waste. If containers are not uniquely identified, how is proper treatment insured after storage with a large number of other drums."

MDC Response

Yes, all containers are properly identified when placed in the RCRA storage areas. Containers are uniquely identified. When the drums are filled at the source of the waste, "the generating department supervision identifies, dates, signs, and affixes a tag to each drum. EPC inspects drums for the proper tag, then adds a hazardous waste label ... " (Part "B" Application, Section "C", Page 8). The information on the "tag" and "label" provide a positive identification of generic

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chemical name plus DOT classification). By the time of shipment to the treatment/disposal facility, we will have performed tests to analytically confirm the composition of each container.

EPA Statement

"2. We would suggest that the inspection schedule for your RCRA facilities be incorporated into the inspection log. Thus, a record of all items inspected would be maintained."

MDC Response

Enclosure (2) is a copy of our inspection instructions. We assume these meet your definition of "inspection schedule." Our inspection instructions were derived from our Part "B" Application.

EPA Statement

"3. Do the emergency coordinators have formal authority to commit resources necessary to carry out the contingency plan?"

MDC Response

The emergency coordinators listed in Enclosure (1) have the formal authority to commit the resources of the MDC Plant Engineering Department, including equipment, materials, and personnel necessary to carry out the contingency plan. In the event of fire or explosion, the authority to deploy firefighting equipment and firemen rests with the Fire Services Shift Commander; however, environmental concerns remain the responsibility of the emergency coordinator.

Due to recent managerial changes, we have revised the list of emergency coordinators as originally filed [see Enclosure (1)]. We are providing sufficient copies to EPA and MDNR to allow for upgrading previously submitted Part "B" Application copies.

EPA Statement

"4. In the inspection report, it was specified there was evidence that the Storage Area 2 containment had been breached. According to your permit application the curb area and sump are designed to contain 174 gallons. Is this volume correct? What was the source of the material that overflowed? How often is the containment area inspected?"

MDC Response

The sump and curb area is designed to contain 174 gallons. The source of fluid that flowed through this curbed area was rainwater. This containment area is inspected each workday. The source of this rainwater was threefold and is in the process of being eliminated. Please refer to Enclosure (3). This shelter is now open on all sides. We have designed weatherproof walls for the north, south, and east sides. This will prevent the majority of rainfall from entering this structure. In addition, we will add a concrete "plug" between the post pedestal and drive-over curb on both sides to prevent rainwater runoff from flowing across the front of this shelter between the sump and the drive-over curb. This work will be completed during the next several months.

EPA Statement

"5. Do 'poly tanks' have a cover? If not, what freeboard is maintained in these tanks? Why was the ruptured piping incident not recorded in the inspection log? Please describe the ruptured piping incident."

MDC Response

Each "poly tank" does have a cover and each cover is in place. We were initially unable to respond to the "ruptured piping incident" because we were not aware of any such incident. Assuming that this "incident" must have been part of your contractor inspector's report, we requested a copy of this report. Mr. Stephen Busch forwarded a copy of the Pedco Environmental, Inc. inspection report. During the 06 July 1983 inspection, we informed your contractor inspector that the condition that he described in his report as "the containment system below the tanks has been breached by what appears to have been a rupture of the drainage system piping" was actually the valved piping connection that allowed us to pump acid directly from our process tank to a removal vehicle, thus bypassing the storage tanks [see Enclosure (4)]. When acid is pumped from the process tank into the storage tanks, water is used to flush the piping. Residual water is drained through this valve and onto the crushed limestone, where it flows into our Industrial Wastewater Pretreatment Plant. (Refer to Part "B" Application, Page D-20.) Indeed, the limestone was eroded due to minor amounts of residual acid. Fresh limestone has been placed in the area.

EPA Statement

"6. Are all necessary warning signs posted? Are the required signs posted in tank storage areas?"

MDC Response

Warning signs with the statement "Danger - Unauthorized Personnel Keep Out" are posted at each location where hazardous wastes are stored. This does include above-ground and underground tanks that contain hazardous wastes that are excluded from RCRA regulation but subject to Missouri Hazardous Waste regulations.

EPA Statement

"7. In your January 17, 1983, response to our request for engineering certification of design adequacy of RCRA regulated facilities, you referenced Missouri Department of Natural Resources Form SCI (sic). That form certifies the application has been prepared to comply with Missouri rules and regulations. This will not suffice as an engineering certification of technical adequacy of RCRA regulated facilities for EPA purposes. Please submit an adequate engineering certification."

MDC Response

Please see Enclosure (5).